

Email from Chris Sanders of Calpine comments on September 2006 Agenda Item

Hi Frances,

Here are our suggested changes to language in the draft WDRs for Calpine Glass Mountain. In my efforts to change as few words as possible, I believe Finding No. 8 remains a bit confusing as to whether the Order must be modified to allow acidification. As a result, I have included an alternative Finding No. 8 that provides more specificity to acknowledge that EO approval is mandatory but that Order modification is not.

Please let me know whether the RWQCB would have any objections to these revisions.

Finding No. 8

The Discharger proposes in the Report of Waste Discharge to use acid for “formation stimulation*” in the production zone of existing Well Nos. 68-8, 31-17 and 87-13 or any new well in the Telephone Flat Area. BLM issued a sundry notice [approval] in April 2003 for the formation stimulation of Well No. 31-17 by injection of hydrofluoric/hydrochloric acid. This is the only well in the KGRA presently approved by BLM for formation stimulation. BLM has determined that formation stimulation will not be permitted on any additional wells until the completion of additional NEPA review. This Order also prohibits formation stimulation on any other well within Telephone Flat or Fourmile Hill Unit Lease Areas, until BLM issues a sundry notice for the well. Upon issuance of the sundry notice, and approval of the Executive Officer, this Order will be reopened, if necessary, to allow formation stimulation of additional wells and specify any additional conditions to address mitigation measures relevant to water quality.

Alternative Finding No. 8

The Discharger proposes in the Report of Waste Discharge to use acid for “formation stimulation*” in the production zone of existing Well Nos. 68-8, 31-17 and 87-13 or any new well in the Telephone Flat Area. BLM issued a sundry notice [approval] in April 2003 for the formation stimulation of Well No. 31-17 by injection of hydrofluoric/hydrochloric acid. This is the only well in the KGRA presently approved by BLM for formation stimulation. BLM has determined that formation stimulation will not be permitted on any additional wells until the completion of additional NEPA review. This Order also prohibits formation stimulation on any other well within Telephone Flat or Fourmile Hill Unit Lease Areas, until BLM issues a sundry notice for the well. Upon issuance of the sundry notice, the Discharger shall also seek approval of the Executive Officer. This Order may be reopened, if necessary, to acknowledge formation stimulation of additional wells and specify any additional conditions to address mitigation measures relevant to water quality.

Discharge Prohibition A.5

The injection of acids or other Enhanced Geothermal System (EGS) materials to wells other than Well No. 31-17 is prohibited until BLM issues sundry notices allowing acidification of additional wells. The Discharger shall submit its plans for formation stimulation to the Executive Officer for approval at least 30 days prior to time of desired commencement. This Order may be revised to reflect such changes and additional groundwater monitoring wells may also be required.